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Attorneys for Plaintiff
7 THE WAVE STUDIO, LLC

8
9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 THE WAVE STUDIO, LLC, a New York
13 Limited Liability Company,

14 Plaintiff,

15 v.

16 AMERICAN EXPRESS COMPANY, a New
York Corporation, and DOES 1-100,

17 Defendants.
18

Case No.: 3:15-CV-00354-WHA

**STIPULATION TO TRANSFER CASE TO
THE SOUTHERN DISTRICT OF NEW
YORK AND ~~(PROPOSED)~~ ORDER
THEREON**

19 Plaintiff, The Wave Studio, LLC (“Plaintiff”), and Defendant American Express Company
20 (“Amex”), by and through their attorneys of record hereby agree and stipulate as follows:

21 The Parties stipulate that the above-captioned proceeding shall be transferred to the
22 Southern District of New York. Amex believes this case is related to litigation currently pending
23 before Hon. Cathy Seibel of the Southern District of New York, styled *The Wave Studio, LLC v.*
24 *General Hotel Management, et al.*, Case No. 7:13-cv-09239 (S.D.N.Y.) (the “GHM Action”) and
25 should therefore be consolidated with the GHM Action. Plaintiff denies this action is related to the
26 GHM Action. The parties agree that the transfer stipulated here is without prejudice as to the issue
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1 of consolidation with the GHM Action and that upon transfer to the Southern District of New York,
2 Amex may seek to file a motion to consolidate this action with the GHM Action.

3 THEREFORE, THE PARTIES HEREBY STIPULATE that this action be transferred to the
4 Southern District of New York.

5 IT IS SO STIPULATED.

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7 DATED: April 30, 2015

COBALT LLP

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9 By: /s/ Vijay K. Toke
10 Vijay K. Toke

11 Attorneys for Plaintiff
12 THE WAVE STUDIO, LLC

13 DATED: April 30, 2015

AKIN GUMP STRAUSS HAUER &
14 FELD LLP

15 By: /s/ Anthony T. Pierce
16 Anthony T. Pierce
17 (*Admission by pro hac vice*)

18 Attorneys for Defendant
19 AMERICAN EXPRESS COMPANY

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21
22 Dated: April 30, 2015.



23 Hon. William H. Alsup

24 UNITED STATES DISTRICT JUDGE

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